

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: February 22, 1982

Lynn
return to RLS

SUBJECT: Ellisville Site

FROM: Kerry Herndon *Kerry Herndon*
Superfund Section

TO: Robert L. Morby
Chief, Waste Management Branch

THRU: Katie Biggs
Superfund Section *K Biggs*

*Kerry has all my info &
says she will contact
us if she needs anything
else.*

*RLS
2-24-82*

In order to get money allocated for the Callahan portion of the Ellisville site, there are a number of issues which need to be resolved. Barabara Peterson and I have discussed how the enforcement issues and technical issues can be resolved within a mutual time period so that Counsel can concur on the allocation at the same time that we have an action memo ready for signature. In order to accomplish this task, I have outlined issues, both technical and legal which need to be resolved, many of them with the help of other people. I propose that we resolve the listed issues in coordination with appropriate persons or work units and with a schedule as follows:

1. Match the wastes from Callahan and Rosalie to generators prior to a meeting with American Can and G.K. Technologies (work complete by March 5).

Kerry Herndon - Prepare Task Order for E&E to match generators with wastes based on labeling, suppliers, waste characteristics, information supplied by generators and industry effluent guidelines or process information. Also provide a cost estimate for disposal of drums and costs for further characterization. *Complete 2-19-82*

Jim Jackson - Complete drum data input into computer.

2. Locate a storage facility for EPA's samples. *by 4/19/82.*

Kerry Herndon - Contact state lab; ask for other recommendation if state lab not available. *done - 2-19-82*

Doris Finlay - Prepare list of interim status storage facilities in Missouri.

Bob Stewart -

or other suitable space
Answer permit questions: *Complete 2-22-82*

When do samples become wastes? *- after they are analyzed & become waste*
What are storage and container requirements? *- transportation requirements by DOT.*
What interim status standards apply to sample storage? *none*



R00173886

RCRA RECORDS CENTER

Kerry to write memo to compliance requesting more

3. Address permit issues (by March 12). Done - BOTH EPA and MDNR

Pmts & Cmpl

- Determine compliance of EES facility. *ENFC discretion until 3-1-82 If stored after, not in compliance.*
- Issue EPA's permit for Callahan storage site. *done*
- Determine when MDNR will issue Callahan site a permit and terms of state permit. *Morby met 2-19-82 → emergency directive issued until 5-18-82*
- Locate a permitted facility if removal of drums from Callahan site becomes necessary. *(or EES) - Doris has IS list*

4. Development amendment to Cooperative Agreement (by April 15).-

Doris Finlay - Assist state in developing a request for an amendment and amendment package.

Kerry Herndon - Provide work scope and cost estimate for fast track to Doris for inclusion in Cooperative Agreement.

5. Assist state with Deviation Request (by March 12).

Doris Finlay - Assure the transmittal of state's cost accounting to EPA Headquarters.
- Track Deviation Request review.

6. Prepare memo to Tom Budd requesting an accounting of administrative time spent on the Ellisville site (by February 26). *and Travel -*

Doris Finlay - Memo should request information by March 12.

7. Assure the preparation of an Action Memo for the Callahan "fast track" (~~by March 26~~). *4-12-82*

Kerry Herndon - Supply work scope and cost estimate to Headquarters after meeting with Black & Veatch.
- Provide concurrence on draft.

8. Determine bid procedures for contracting disposal under the "fast track" remedial process (by March 12).

Doris Finlay - Determine how to fast track bid process for both state and EPA ~~per~~ sites. How are subcontracts effected? Can MDNR use its current contractor for disposal of drums from Callahan ~~to~~ *and* Rosalie?

9. Provide critique of Ellisville immediate removal action to John Franke (by March 5).

Doris Finlay - Prepare divisional memo by combining comments from Herndon, Morby and Wagoner.

10. Prepare a letter to Callahan's attorney describing samples he is to receive (by March 5).

Barbara Peterson - Write letter

Bob Stewart - Provide Kerry Herndon with answer to two above.

Bill Keffer - Answer questions on handling and safety procedures for samples and nature of wastes.

11. Resolve issue of additional notice letters (by March 9).

Barbara Peterson -

12. Provide comments to the state on the American Can/G.K. Technologies counter proposal - Barbara Peterson (by March 1).

- MURPHY + SATTERLEE → 13. Set a date for a meeting with generators. Barbara Peterson (meeting during week of March 15).

14. Resolve issue of whether EPA and state can be joined in an agreement with generators (by March 10).

Barbara Peterson

15. Prepare the Return of Service on the warrant (by March 19).

Barbara Peterson and Bill Keffer

16. Prepare receipt for samples transferred to Callahan attorney (by March 19).

Barbara Peterson and Bill Keffer

I will coordinate tasks 1-9. Barbara will coordinate tasks 10-16.

With these tasks completed by the dates specified, an Action Memo could be signed during the week of March 29, 1982.

I concur with this plan ☒ with the modification - -

I do not concur with this plan ☐

Recommendations:

cc: Barbara Peterson
Bill Keffer
Mike Sanderson
Doris Finlay
Bob Strwart